

DRAFT

PRO HL269003A

Investigating Breaches Of Confidentiality

<i>Action By</i>	<i>Action</i>
<i>WCHD Staff</i>	<ol style="list-style-type: none">1. Reports any suspected breach of confidential information to his/her supervisor, Manager or Director.<ol style="list-style-type: none">1a. If WCHD staff is supervisor or manager, informs director as soon as possible.2. Describes the nature of the breach and the information that was accessed or disclosed.
<i>Director</i>	<ol style="list-style-type: none">3. Assures that other Administrative Staff (Manager, Supervisor) are informed.<ol style="list-style-type: none">3a. If breach relates to HIV/AIDS information, informs Health Officer (WAC 246-100-016(9)).
<i>WCHD Director or Designee</i>	<ol style="list-style-type: none">4. Informs Human Resources and WCHD legal advisor of the report.5. Obtains the health record and reviews the content.6. Determines if employee suspected of breaching Confidentiality signed the confidentiality form and viewed confidentiality video.<ol style="list-style-type: none">6a. If no record of training on file, discuss with employee's supervisor and assure all staff assigned to supervisor have record of training, and signed statement on file.7. Interview witnesses, if any.8. Interview the employee suspected of breaching confidentiality, either with or without union representation, depending on advice from Human Resources.9. Documents results of investigation in narrative form on Whatcom County Employee Counseling Form.

	<p>9a. If designee was assigned to investigate presents the results of investigation to WCHD Director.</p> <p>10. Develops corrective action plan based on Human Resource recommendations.</p> <p>10a. If designee was assigned to investigate reviews Corrective Action Plan with WCHD Director.</p>
WCHD Director	<p>11. Consults with Division Manager and/or Program Supervisor on recommendations.</p> <p>12. If questions or concerns, consults with legal advisor and/or Human Resources.</p> <p>13. Makes final decision on any necessary corrective action.</p>
Manager or Supervisor	<p>14. Meets with employee to discuss results of investigation and corrective action plan.</p> <p>15. Completes corrective action plan with employee.</p> <p>16. Documents that corrective action plan was completed.</p>

**Whatcom County Health Department Procedure – HL269003A
Investigating Breaches of Confidential Information**

Topic: Medical Records

Effective Date:

This procedure is in force at this time; however, it is new and therefore subject to a ninety-day trial period. Please provide your input regarding the policy. E-mail your comments, suggestions and questions to (insert name).

Approved by: Regina A. Delahunt, Director

Cancels: (if applicable)

See Policies:

☐ HL169003Z Keeping Confidentiality of Health Care Information

See Also:

☐ HL469003A HHS Confidentiality Statement